

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ABRAHAM KLEINMAN,

Plaintiff,

v.

ROC CAPITAL HOLDINGS LLC,
CHAIM PORGES, and HELENA
PORGES,

Defendants.

Case No. 1:22-cv-2566-ALC

**REQUEST FOR CERTIFICATE OF
DEFAULT AS TO DEFENDANT ROC
CAPITAL HOLDINGS LLC**

Pursuant to Fed. R. Civ. P. 55(a), plaintiff Abraham Kleinman requests a Clerk's certificate of default against defendant Roc Capital Holdings LLC. As set forth in the accompanying declaration of Moshe O. Boroosan, Esq., the party against whom the judgment is sought: (i) is not an infant or incompetent person; (ii) is not in the military service; (iii) was properly served under Fed. R. Civ. P. 4 and proof of service was duly filed with the Court; and (iv) has defaulted in appearing in the above-captioned action.

DATED: April 26, 2022

LAW OFFICES OF MOSHE BOROOSAN, P.C.

/s/ Moshe O. Boroosan

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